

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

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VIKRAM P. GROVER d/b/a  
“IX ADVISORS” a/k/a “IXA,”  
  
Plaintiff,  
  
v.  
  
NET SAVINGS LINK, INC., a  
Colorado corporation and formerly  
organized as a Nevada corporation,  
WILTON GROUP, LIMITED, as  
registered in the Isle of Man, U.K.,  
WILTON UK (GROUP), LIMITED, as  
registered in England and Wales, U.K.,  
CHINA FOOD AND BEVERAGE CO.,  
a Colorado corporation, and  
JAMES A. TILTON,  
  
Defendants.

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Civil Action No. 1:21-cv-05054  
Honorable Mary M. Rowland

**DEFENDANTS RESPONSE TO PLAINTIFF VIKRAM GROVER’S MOTION TO  
STRIKE DEFENDANT  
JAMES TILTON’S “ADDITIONAL RESPONSE” TO PLAINTIFF’S  
REPLY MEMORANDUM IN SUPPORT OF HIS MOTION FOR  
SUMMARY JUDGMENT AND FOR SANCTIONS AND ATTORNEY’S FEES**

1. NOW COMES James Arthur Tilton, and I am the President, a director, and majority shareholder of Net Savings Link, Inc. (“NSAV”) and I am the President, a director, and a minority shareholder of China Food and Beverage Company (“CHIF”).
2. I, the defendant, wish to request that the Honorable Court not grant the plaintiff’s motion to strike my “Additional Responses” to plaintiff’s reply memorandum in support of his

motion for summary judgment and for sanctions and attorney's fees, for reasons that I will list below.

3. On February 21, 2024, I filed, timely, my response with the Honorable Court to plaintiff's motion for summary judgment. I was aware that plaintiff's reply to my response was due on February 28, 2024. However, I was unaware that I was prohibited from filing additional information to my timely filed response, especially if it was before the due date of plaintiff's reply, which it was. I sincerely apologize to the Honorable Court if this was a violation of the rules. In addition, I felt that the additional information that I submitted on February 27, 2024, was critical in deciding this case. Perhaps this is the reason that plaintiff's counsel wants this information stricken.
4. The response that I filed with the Honorable Court on March 13, 2024, was clearly in response to the plaintiff's reply filed on February 28, 2024. I was unaware that I was not permitted to respond to plaintiff's reply and I sincerely apologize to the Honorable Court if that is the case. However, I felt, in the name of justice, that I needed to respond when plaintiff's counsel stated that my evidence was part of my vivid imagination. I take that as being called a liar. The truth is that both from the filings that I have made to the Honorable Court, my deposition with plaintiff's counsel and the documents that I supplied to plaintiff's counsel in discovery, plaintiff's counsel is the one with the vivid imagination and regretfully, plaintiff's counsel (and plaintiff) is knowingly and willfully misleading the Honorable Court and in some cases making false statements as well.

5. In plaintiff's motion, filed with the Honorable Court on April 2, 2024, plaintiff's counsel again basically accuses me of lying to the court, "On March 13, 2024, Defendant Tilton filed yet another "Response," replete with misstatements and irrelevancies, with this Court to the Plaintiff's Reply Memorandum.". Again, in this instance, I felt a legal obligation to respond, as plaintiff's counsel is once again making false statements to the court.
6. In plaintiff's motion, filed with the Honorable Court on April 2, 2024, plaintiff's counsel stated that I have not completed the document request. In my opinion, I believe that I have provided all the material and relevant information and documents related to this case. In fact, plaintiff's counsel seems to be implying to the Honorable Court that I have not provided critical information and documents that prove, beyond a shadow of a doubt, that plaintiff has knowingly and willfully hidden material information from me and in other numerous instances, grossly misled me. The documents that I have supplied plaintiff's counsel in discovery clearly prove otherwise and support my statements.

Again, and for the reasons stated above, I kindly request that the Honorable Court does not grant the plaintiff's motion to strike my "Additional Responses" to plaintiff's reply memorandum in support of his motion for summary judgment and for sanctions and attorney's fees.

I declare under penalty of perjury and under the laws of the United States of America that the foregoing is true and correct.

Executed this 4<sup>th</sup> day of April, 2024.

  
James A. Tilton